

SETON HALL UNIVERSITY SCHOOL OF LAW  
CENTER FOR SOCIAL JUSTICE  
FAMILY LAW CLINIC  
833 McCarter Highway  
Newark, New Jersey 07102



Kevin B. Kelly, Esq., Associate Clinical Professor  
Kevin.Kelly@shu.edu  
Jessica Miles, Esq., Visiting Assistant Clinical Professor  
Jessica.Miles@shu.edu

(973) 642-8700  
Fax (973) 642-5939

October 29, 2010

The Honorable Stanley R. Chesler, U.S.D.J.  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey, 07101

**Re: MIRNA JUDITH RODRIGUEZ CARNELLI v. TANCREDO  
ANTONIO CANABE PAZ. 10-3083 (SRC)**

Dear Judge Chesler,

We represent the Petitioner, Mirna Judith Rodriguez Carnelli, in the above matter. We received a request on October 28, 2010 from Respondent's newly retained counsel, Anthony Guerino, Esq., for additional time to respond to Petitioner's motion that is calendared for November 15, 2010. This motion has already been adjourned from the original motion date of November 1, 2010.

We are sympathetic to counsel's request, as there is limited time for him to turnaround a response by his reply date of November 1, but we are unable to adjourn the motion to the next motion date, December 6, 2010, as I am out of state on that date. However, we informed counsel that, should the Court be willing to hear the matter on a non-motion date, we would be willing to adjourn to the following dates: Monday, November 22, 2010, Wednesday, November 24, 2010, Monday, November 29, 2010, or Wednesday, December 1, 2010. This would set counselor's reply date to, Monday, November 8, 2010, Wednesday, November 10, 2010, Monday, November 15, 2010, or Wednesday, November 17, 2010, respectively.

In light of our client's interest in the return of her child, we are not comfortable with an adjournment to a further motion date beyond what we have described above.

Respectfully Yours,



Kevin B. Kelly, Esq.

cc: Anthony Guerino, Esq., via Facsimile (973)-589-2022